

D. Davis 4/4/18

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Court
Southern District of Texas
FILED

APR 04 2018

David J. Bradley, Clerk of Court

United States of America
v.
Briceida Rodriguez Rodriguez

Case No.

Defendant

H18-0500M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 04/03/2018 in the county of Walker in the SOUTHERN District of TEXAS, the defendant violated TITLE 8 U. S. C. § 1324(a)(1)(A)(v)(I), an offense described as follows:

did unlawfully, knowingly and intentionally combine, conspire, confederate, agree and have a tacit agreement with others known and unknown to commit an offense against the United States, namely, transporting and harboring aliens illegally within the United States contrary to 8 U.S.C. 1324(a)(1)(A)(ii) and (iii).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

William P. Wilson Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/04/2018

Judge's signature

City and state: Houston, Texas

Frances H. Stacy, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, William P. Wilson, being first duly sworn, depose and state the following:

1. I am a Special Agent with Homeland Security Investigations (HSI). I have been so employed since 2001. I have training and experience in alien smuggling investigations.

2. The information enumerated in the paragraphs below, furnished in support of this affidavit, is derived from my own observations and the observations of other law enforcement agents.

3. On April 3, 21018, at approximately 7:40 am, Trooper Art Morgan with the Texas Department of Public Safety initiated a vehicle stop on a black Toyota Sequoia (TX license plate CYY1111) for Failure to Signal Lane Change. The stop was executed in Walker County, just south of Huntsville, Texas. There were seven (7) passengers inside the vehicle.

5. Homeland Security Investigations (HSI) and Border Patrol Agents (BPA) responded and determined the driver, identified as Briceida RODRIGUEZ RODRIGUEZ, is a citizen and national of Mexico and is illegally present in the United States (U.S.). The seven (7) vehicle passengers were determined to be citizens and nationals of Guatemala or Mexico, all of whom were illegally present in the U.S. All seven (7) subjects, including one (1) juvenile, admitted to entering the U.S. without inspection in/at a location not designated as an official U.S. Port of Entry. All seven (7) undocumented aliens (UDAs) were administratively arrested for entering the U.S. without inspection. They were later transported to the Houston Immigration Service Processing Centers (SPC) for additional checks and further investigation.

6. BPA John Gilbert read and explained to Briceida RODRIGUEZ RODRIGUEZ her Miranda Rights in the English language and witnessed by HSI Special Agent William Wilson. Briceida RODRIGUEZ RODRIGUEZ signed a voluntary waiver of her Miranda Rights and agreed to speak with agents without an attorney present. BPA Gilbert and SA Wilson interviewed RODRIGUEZ RODRIGUEZ in the English and Spanish language. Briceida RODRIGUEZ RODRIGUEZ acknowledged driving the seven (7) UDAs and claimed she knew the individuals were illegally present in the U.S. and she knew what she was doing was illegal. RODRIGUEZ RODRIGUEZ claimed she left the stash location in Houston Texas early on the morning of April 3, 2018 and she was supposed to go to Dallas, TX and receive instructions from "Senor" as to where to deliver the UDAs. RODRIGUEZ RODRIGUEZ says she was given approximately \$500 for expenses and she was to be paid an additional \$1,000 after delivering all of the UDAs. RODRIGUEZ after her arrest revealed approximately \$566 in cash.

7. SA Ricardo Morales interviewed Fabian Salazar-Vazquez in the Spanish language and recorded the interview. Salazar Vazquez also identified through a photo lineup, Briceida RODRIGUEZ RODRIGUEZ. Fabian Salazar Vazquez stated RODRIGUEZ RODRIGUEZ drove him and the other 6 (six) UDAs from a residence to the location where DPS made the stop.

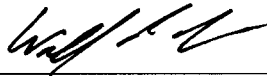
8. BPA Ruben De La Torre interviewed Alfredo Torres Tiro in the Spanish language and was witnessed by SA Eric McCall and recorded. Torres Tiro identified RODRIGUEZ

RODRIGUEZ in a photo lineup. Alfredo Torres Tiro stated RODRIGUEZ RODRIGUEZ was the driver of the vehicle that brought him from the stash location to the location they were stopped by DPS.

9. BPA Johnny Paniagua interviewed Jose Luis Pacheco Garcia in the Spanish language and was witnessed by SA Dan Bodiford and recorded. Pacheco Garcia identified RODRIGUEZ RODRIGUEZ in a photo lineup. Jose Luis Pacheco Garcia stated RODRIGUEZ RODRIGUEZ was the driver of the vehicle that brought him from the stash location to the location they were stopped by DPS.

10. SA Ricardo Morales interviewed Gerber Perez Garcia in the Spanish language and recorded the interview. Perez Garcia also identified through a photo lineup, Briceida RODRIGUEZ RODRIGUEZ. Gerber Perez Garcia stated RODRIGUEZ RODRIGUEZ drove him and the other 6 (six) UDAs from a residence to the location where DPS made the stop.

11. Based upon the evidence gathered from the investigation, I believe there is probable cause to believe that Briceida RODRIGUEZ RODRIGUEZ violated Title 8, United States Code, Section 1324 (a) (1) (A) (v) (I), conspiracy to transport illegal aliens.



Special Agent William P. Wilson
Homeland Security Investigations
Houston, Texas

Sworn and subscribed before me at Houston, Texas on April 4, 2018 and I find probable cause.



Frances H. Stacy
United States Magistrate Judge